

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
CENTRAL DIVISION

UNITED STATES OF AMERICA,

CR 21-30017-RAL

Plaintiff,

FACTUAL BASIS STATEMENT

vs.

LLOYD JACOB ONE STAR,
a/k/a Lloyd One Star, III,

Defendant.

Defendant states that the following facts are true, and the parties agree that they establish a factual basis for the offense to which Defendant is pleading guilty pursuant to Fed. R. Crim. P. 11(b)(3):

On or about the 14th day of December, 2020, in Todd County, in Indian country, in the District of South Dakota, the defendant, Lloyd Jacob One Star, a/k/a Lloyd One Star, III, an Indian, did unlawfully assault Bobbi Jo Knox, and said assault resulted in serious bodily injury, in violation of 18 U.S.C. §§ 1153 and 113(a)(6).

On the afternoon of December 14, 2020, Bobbi Jo Knox (Bobbi) and the Defendant were at their residence in the Grass Mountain Community, in Todd County, South Dakota. At some point, they began to argue. The Defendant became angry and grabbed Bobbi and punched her in her left eye with his fist, causing serious bodily injury to her eye. He also kicked her in the chest with shod feet, and he hit her with a chair.

The Defendant's father was present in the residence and heard the commotion from another room. When he went to see what was happening, he observed Bobbi lying on the floor with the Defendant standing over Bobbi. The Defendant was still holding the chair and pushing it down on Bobbi. The Defendant's father intervened and pushed the Defendant away from Bobbi, and Bobbi ran out of the room. The Defendant threatened to kill them and began hitting the walls with his fists and head, and he knocked over a china cabinet in the dining room. The Defendant then fled the residence.

Rosebud Sioux Tribe Law Enforcement Services (RSTLES) officers subsequently responded to a call for service from the residence. When officers arrived, they observed the china cabinet was knocked over and broken glass was on the kitchen floor. Bobbi was located in a bedroom lying on the bed with a cloth covering her face. Her left eye was swollen shut and the bridge of her nose appeared swollen.

Bobbi was transported by ambulance to the Rosebud Comprehensive Healthcare Facility in Rosebud, South Dakota. She reported severe pain and loss of vision in her left eye and was transferred by air ambulance to Sanford USD Hospital in Sioux Falls, South Dakota. She was diagnosed with a ruptured globe injury to her left eye, and underwent surgery.

The assault by the Defendant upon Bobbi Jo Knox resulted in serious bodily injury in that it involved extreme physical pain and the protracted impairment of the function of a bodily member or organ. At all times relevant to the offense, Bobbi was an intimate partner and dating partner of the

Defendant.

The Defendant is an "Indian" under the provisions of 18 U.S.C. § 1153 in that he is an enrolled member of the Rosebud Sioux Tribe, a federally recognized tribe, with enrollment number 345U029084, and 53/64 degree of Indian blood. The offense occurred in Todd County, South Dakota, which is within the exterior boundaries of the Rosebud Sioux Indian Reservation. This location is "Indian country" within the provisions of 18 U.S.C. §§ 1151 and 1153.

DENNIS R. HOLMES
Acting United States Attorney


5/19/2021
Date


Kirk W. Albertson
Assistant U.S. Attorney
225 S. Pierre Street, # 337
Pierre, SD 57501
Telephone: (605) 224-5402
Facsimile: (605) 224-8305
E-Mail: kirk.albertson@usdoj.gov

5-21-21
Date


Lloyd Jacob One Star
Defendant

5-21-21
Date


Randall B. Turner
Attorney for Defendant